

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
 )  
THIS DOCUMENT RELATES TO: )  
All Cases )

CASE NO. 1:17-MD-2804

Judge Dan Aaron Polster

**PEC's SHARING AGREEMENT WITH STATES ATTORNEYS GENERAL**

The Plaintiffs' Executive Committee ("PEC") and the States Attorneys General are at the forefront of active litigation against the manufacturers and distributors of prescription opioids. The PEC previously consented to sharing with the States Attorneys General its ARCOS platform. (Dkt. #510). The PEC agrees to also share with the States Attorney General the pleadings, depositions and documents (including work-product coding) arising out of discovery conducted in MDL2804. Sharing these discovery materials will **not** result in a common benefit assessment by the PEC upon any recovery by the States.<sup>1</sup>

Respectfully submitted,

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<sup>1</sup> The States Attorney General requesting access to discovery materials will be required to execute an acknowledgment abiding by the terms of *Case Management Order No. 2: Protective Order* (Doc #: 441) (Filed: 05/15/18) and/or the *Revised Protective Order* (Doc #: 1853) (Filed: 07/18/2019).

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19th day of July 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

*s/Peter H. Weinberger*  
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Plaintiffs' Co-Liaison Counsel